

Excerpt from 10/31 Resolution Plan

Comment/Response Summary of the Work in Progress Water Quality Affected Environment Report

Water Quality Component Report Executive Summary	<p>The agency is concerned that a natural process (the breakdown of naturally occurring organic materials in the Delta) is being characterized as pollution and laid at the doorstep or agricultural operations in the Delta. It is our belief that at least an equivalent amount of organic carbon would be generated by the natural decomposition of decaying plant materials and peat soils. In fact, such decomposition of organic materials form the very basis of the food chain upon which the ecosystem is dependent. We ask that you modify the report as follows:</p> <p>Page E-4, last paragraph: <u>Of particular concern to drinking water is organic carbon generated by decomposition of the peat soils and plant biomass which occur in the Delta. Much of this organic carbon is currently collected and discharged to the Delta channels by agricultural drainage, although historically the same land mass drained naturally into the sloughs and channels of the Delta.</u></p>	Thomas M. Zuckerman, Central Delta Water Agency	8/13/97	<p>RICK'S Response - undated: Thank you for your comments on the Component Report. I agree we need to be careful how organic carbon inputs to the Delta are portrayed. I also agree with your contention that evidence is lacking to prove organic carbon contributions from Delta islands under agricultural production are greater than might be the case under "natural" conditions. Therefore, there is inadequate scientific support for blaming Delta agricultural interests for causing pollution that exceeds historical conditions. On the other hand, discharges from islands do affect Delta water quality adversely with respect to drinking water supply. From this perspective, organic carbon is a pollutant. In my view, water quality degradation from whatever source is undesirable; and, I think this would be true of discharges from Delta islands whether resulting from agricultural practices or natural conditions. Therefore, I believe it should be CALFED's interest to support measures to reduce problems from this source where feasible, without an intention to single out individuals as causes of the problem. We do not intend to finalize the Draft Component Report, as this is only a working document provided for the use of the WQTG. We intend to incorporate your comments into the Water Quality Technical Appendix to the CALFED Programmatic EIR/EIS where this material will formally appear. Specifically, the changes you recommend to page E-4, last paragraph and page 3-5 first paragraph, seventh sentence, will be adopted. Your comments on Section 2, page 2-2 and page 3-5 last paragraph make reference to average DOC levels found in drinking water supplies in the U.S. We are aware of one or more nationwide surveys. However, it is not clear whether this reference is to one of these surveys or from another source. We would appreciate your providing us with specific support for the statements you recommend.</p> <p>October 27, 1997: References not provided by 10/27/97, so comment was not included in 10/31/97 version.</p>
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